

May 18, 2016

Via Messenger

Ms. Luly Massaro
Division Clerk
Division of Public Utilities and Carriers
89 Jefferson Boulevard
Warwick, RI 02888

RECEIVED
2016 MAY 18 PM 3:22

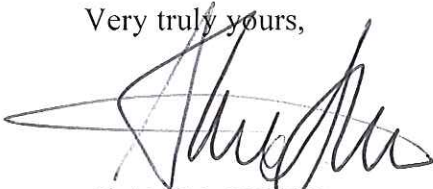
Re: *Invenergy, PUC Advisory Opinion, Docket No. 4609*

Dear Luly:

On behalf of Invenergy, enclosed please find an original and 7 copies of Invenergy Thermal Development LLC's Responses to the Conversation Law Foundation's 4th Set of Data Requests in connection with the above docket.

Please let me know if you have any questions.

Very truly yours,



ALAN M. SHOER
ashoer@apslaw.com

Enclosures

cc: Service List (*via e-mail*)

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: INVENERGY THERMAL DEVELOPMENT :
LLC'S PROPOSAL FOR CLEAR RIVER ENERGY : DOCKET NO. 4609
CENTER :

INVENERGY THERMAL DEVELOPMENT LLC'S RESPONSES TO
THE CONSERVATION LAW FOUNDATION'S 4th SET OF DATA REQUESTS

REQUEST 4.1: This Data Request refers to the second page of the spread sheet that Invenergy provided on January 28, 2016, in response to CLF Data Request 1-3, entitled "Rhode island Energy Cost Savings from Clear River."

RECEIVED
2016 MAY 18 PM 3:22

- (a) Invenergy showed its project for capacity savings to Rhode Island ratepayers by calendar years. Please provide the same information for each of: Capacity Commitment Period 10 (June 1, 2019 to May 31, 2020); CCP-11 (June 1, 2020 to May 31, 2021); and CCP-12 (June 1, 2021 to May 31, 2022). (Note: CLF believes that this Data Request does not ask Invenergy to create a document that does not already exist, as this information appears to have been provided by CCP in Invenergy's January 12 EFSB presentation, Slide 24).
- (b) There is a column on this spread sheet entitled "ISO-NE Cleared Capacity." Please state whether these figures are (or are not) net of 975 MW of HQICC.

RESPONSE 4.1 (a) Please see '02c - Clear River Capacity Cost to Load_Demonstrative - Pre FCA 10 - by DY.xlsx', attached as Exhibit 1.

RESPONSE 4.1 (b) The cleared capacity values are *not* net of HQICC.

RESPONDENT: Mark Repsher, PA Consulting, Inc.

DATE: May 18, 2016

INVENERGY THERMAL DEVELOPMENT LLC
By its Attorneys,

/s/Alan M. Shoer

Alan M. Shoer, Esq. (#3248)
Richard R. Beretta, Jr. Esq. (#4313)
Nicole M. Verdi, Esq. (#9370)
ADLER POLLOCK & SHEEHAN, P.C.
One Citizens Plaza, 8th Floor
Providence, RI 02903-1345
Tel: 401-274-7200
Fax: 401-751-0604
Dated: May 18, 2016

CERTIFICATE OF SERVICE

I hereby certify that on May 18, 2016, I delivered a true copy of the foregoing responses to Conservation Law Foundation's Data Requests via electronic mail to the parties on the attached service list.

/s/ Alan M. Shoer

EXHIBIT 1

